

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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LGN INTERNATIONAL, LLC, and,  
PRUDENT INVESTIMENTOS LTDA,

No. 21-cv-940-WMS

Plaintiffs,

- against -

HYLAN ASSET MANAGEMENT, LLC,  
ANDREW SHAEVEL,  
BAHAMAS MARKETING GROUP,  
JOEL TUCKER,  
SQ CAPITAL, LLC,  
JT HOLDINGS, INC.,  
HPD LLC,  
HIRSCH MOHINDRA,  
MAINBROOK ASSET PARTNERS I, LLC,  
WORLDWIDE PROCESSING GROUP LLC,  
FRANK A. UNGARO, and  
BOBALAW VENTURES,

Defendants.

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**DEFENDANTS HYLAN ASSET MANAGEMENT, LLC, ANDREW SHAEVEL,  
MAINBROOK ASSET PARTNERS I, LLC, HYLAN DEBT FUND LLC,  
AND BOBALEW VENTURES' NOTICE OF  
MOTION TO DISMISS PURSUANT TO FED. R. CIV. PRO. 12(b)(6)**

Defendants Hylan Asset Management, LLC, Andrew Shaevel, Mainbrook Asset Partners I, LLC, Hylan Debt Fund LLC (improperly sued as "Hyland Debt Fund LLC"), and Bobalew Ventures (improperly sued as "Bobalaw Ventures") (collectively "Moving Defendants"), by and through their attorneys, Lippes Mathias LLP, and pursuant to Federal Rules of Civil Procedure 12(b)(6), hereby move this Court for an Order dismissing Plaintiffs' Second Amended Complaint (Dkt. 65) in its entirety, with prejudice. This Motion is based upon the accompanying Declaration of Dennis C. Vacco, Esq., Plea Agreement of Joel Tucker (Exhibit 1), Declaration of Andrew

Shaevel (Exhibit 2), and Memorandum of Law. Please be advised that Moving Defendants intend to file a Reply to any Response submitted by Plaintiffs.

WHEREFORE, Moving Defendants, respectfully request that this Court grant their Motion and dismiss Plaintiffs' Complaint with prejudice, together with any other and further relief this Court deems necessary and proper.

Dated: Buffalo, New York  
October 29, 2021

Respectfully submitted,

LIPPES MATHIAS LLP

/s/Dennis C. Vacco

Dennis C. Vacco, Esq.

Scott S. Allen Jr., Esq.

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